

Carla Gowen McClurg, OSB# 165144
Trial Attorney
U.S. Department of Justice
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Attorney for Gail Brehm Geiger, Acting United States Trustee for Region 18, Plaintiff

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON**

In re	Case No. 14-35071-rld7
Cheryl Kae Stites,	
Debtor.	
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In re	Case No. 15-62393-tmr7
Kathleen Arthur,	
Debtor	
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In re	Case No. 15-63116-tmr7
Mary Ann Michiko Roberts,	
Debtor	
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United States Trustee,	Adversary Nos. 16-3013-rld
Plaintiff,	16-6061-rld
	16-6062-rld
v.	DECLARATION OF CARLA
Vincent Howard,	GOWEN McCLURG IN SUPPORT
Howard Law, P.C.,	OF PLAINTIFF UNITED STATES
Erik Graeff,	TRUSTEE'S BILL OF COSTS AND
Law Offices of Erik Graeff, P.C.,	MOTION TO COMPEL AND FOR
	EXPENSES
Defendants.	Trial Date: January 4-5, 2017
	Trial Time: 9:00 a.m.
	Location: Courtroom 3

Pursuant to to 28 U.S.C. § 1920; 28 U.S.C. § 1924; Fed. R. Bankr. P. 7054(b); and Local Bankruptcy Rule 9021-1(d), I, Carla Gowen McClurg, hereby declare under penalty of perjury:

1. I am the attorney for Plaintiff United States Trustee for Region 18, Gail Brehm Geiger (“Plaintiff”) in the above-referenced adversary proceeding. I have personal knowledge of the matters set forth in this Declaration.

2. Plaintiff incurred costs in the total amount of \$18,295.12 in the above-referenced adversary proceeding as itemized in Plaintiff United States Trustee’s Bill of Costs.

3. Plaintiff’s costs referenced in paragraph 2 above are correct, as of December 19, 2016, and were necessarily incurred. As litigation on this matter is ongoing, Plaintiff intends to supplement Plaintiff United States Trustee’s Bill of Costs as additional invoices are received and additional costs incurred.

4. Plaintiff has agreed to the terms of a settlement with defendants Erik Graeff and the Law Offices of Erik Graeff (the “Graeff Defendants”), which includes the payment of some of Plaintiff’s costs. Plaintiff and the Graeff Defendants expect to complete drafting a proposed stipulation and judgment before the date of trial in the above-referenced adversary proceedings.

DATED this 19th day of December, 2016.

Respectfully submitted,
GAIL BREHM GEIGER
Acting U.S. Trustee for Region 18

/s/ Carla Gowen McClurg
Carla Gowen McClurg, OSB# 165144
Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2016 I served a copy of the foregoing

DECLARATION OF CARLA GOWEN McCLURG IN SUPPORT OF PLAINTIFF

UNITED STATES TRUSTEE'S BILL OF COSTS AND MOTION TO COMPEL AND

FOR EXPENSES by mailing a copy of this document, by United States first class mail, postage prepaid, addressed to the following:

Jeffrey A. Katz
1919 N. Heliotrope Dr.
Santa Ana, CA 92706

Vincent Howard
2099 S. State College Blvd., Suite 600
Anaheim, CA 92806

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GAIL BREHM GEIGER
Acting U.S. Trustee for Region 18

/s/ Carla Gowen McClurg
Carla Gowen McClurg, OSB# 165144
Trial Attorney